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Attorneys for Defendants  
7 EUGEN D. WILLIAMS, M.D., LINDA LUI LUONG, P.A., and FULLERTON  
ORTHOPAEDIC SURGERY MEDICAL GROUP, INC.  
8

9 **UNITED STATES DISTRICT COURT**  
10 **FOR THE DISTRICT OF MASSACHUSETTS**

11 IN RE NEW ENGLAND  
12 COMPOUNDING PHARMACY, INC.  
13 PRODUCTS LIABILITY LITIGATION

MDL No. 2419  
Master Dkt. 1:13-md-02419-RWZ

14 THIS DOCUMENT RELATES TO:

15 Jeffries, et al. v. Ameridose, et al.  
16 Docket No.1:14-cv-12789-RWZ  
17

18 **STIPULATION TO STAY THE ACTION BETWEEN THE ARBITRATING PARTIES**  
19 **PENDING BINDING ARBITRATION; [PROPOSED] ORDER**  
20

21 WHEREAS on June 30, 2014, this matter was transferred to this court from the United  
22 States District Court, for the Central District of California,

23 AND WHEREAS 9 USC §§ 3 and 4 provide that matters are referable to arbitration  
24 under a written agreement for arbitration and also for a stay of the trial of the action as to the  
25 arbitrating parties until arbitration has been completed,

26 AND WHEREAS plaintiffs' decedent, John Jeffries, and defendants Fullerton  
27 Orthopaedic Surgery Medical Group, Inc. (aka Fullerton Ortho. & Associates), Eugen D.  
28 Williams, M.D., as a partner of Fullerton Orthopaedic Surgery Medical Group, Inc., and Linda

1 Lui Luong, P.A. as an employee of Fullerton Orthopaedic Surgery Medical Group, Inc., have  
 2 previously contracted for binding arbitration of any dispute concerning medical malpractice, and  
 3 the agreements provide that California law shall apply in the arbitration proceeding, and there  
 4 being true and correct copies of the two Physician-Patient Arbitration Agreements  
 5 ("Agreements") are attached as Exhibit "A" and "B,"

6 IT IS HEREBY STIPULATED by plaintiffs Clay C. Jeffries, individually and as  
 7 successor in interest for John Edward Jeffries, Cynthia A. Cardey, Patrick J. Jeffries, Wynema K.  
 8 Hyndman, John E. Jeffries, Jr., and Reed Jeffries, and defendants Eugen D. Williams, M.D.,  
 9 Linda Lui Luong, P.A., and Fullerton Orthopaedic Surgery Medical Group, Inc., and their  
 10 respective counsel herein, to stay further proceedings in this action between the arbitrating  
 11 parties, until binding contractual arbitration of the claims and controversies alleged herein has  
 12 been completed in accordance with the procedures for arbitration as set forth in the contractual  
 13 agreements between plaintiffs' decedent, John Jeffries, and defendant Fullerton Orthopaedic  
 14 Surgery Medical Group, Inc.

15 IT IS FURTHER STIPULATED that this document may be signed in as many specimens  
 16 as there are signatories to the agreement, and the original of this stipulation will be complete  
 17 when the separate specimens, collected together as a single document, reflect that all signatories  
 18 have executed the stipulation. Copies of fax signatures will have the same force and effect as  
 19 original signatures.

20 DATED: January 29, 2015

**LA FOLLETTE, JOHNSON, DE HAAS,  
FESLER & AMES**

21  
22 By 

23 DENNIS K. AMES, ESQ.

24 ROBERT J. IACOPINO, ESQ.

25 Attorneys for Defendants,

26 EUGEN D. WILLIAMS, M.D., LINDA LUI

27 LUONG, P.A., and FULLERTON

28 ORTHOPAEDIC SURGERY MEDICAL

GROUP, INC.

1 DATED: January 28, 2015

DEFENDANT

2  
3 By Eugen Williams  
EUGEN D. WILLIAMS, M.D.

4  
5 DATED: January \_\_, 2015

DEFENDANT

6  
7 By \_\_\_\_\_  
LINDA LUI LUONG, P.A.

8  
9 DATED: January \_\_, 2015

DEFENDANT

10  
11 By \_\_\_\_\_  
MICHAEL RUBENSTEIN, M.D., President  
12 and authorized agent of FULLERTON  
13 ORTHOPAEDIC SURGERY  
MEDICAL GROUP, INC.

14 DATED: January \_\_, 2015

JANET, JENER & SUGGS, LLC

15  
16 By \_\_\_\_\_  
17 ROBERT K. JENNER, ESQ.  
KIMBERLY DOUGHERTY, ESQ.  
18 Attorneys for Plaintiffs,  
19 CLAY C. JEFFRIES, individually and as  
successor in interest for John Edward Jeffries,  
20 CYNTHIA A. CARDEY, PATRICK J.  
JEFFRIES, WYNEMA K. HYNDMAN, JOHN  
21 E. JEFFRIES, JR., AND REED JEFFRIES

22 DATED: January \_\_, 2015

SKIKOS, CRAWFORD, SKIKOS & JOSEPH

23  
24 By \_\_\_\_\_  
GREGORY T. SKIKOS, ESQ.  
25 Attorneys for Plaintiffs,  
26 CLAY C. JEFFRIES, individually and as  
successor in interest for John Edward Jeffries,  
27 CYNTHIA A. CARDEY, PATRICK J.  
JEFFRIES, WYNEMA K. HYNDMAN, JOHN  
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1 DATED: January \_\_, 2015

DEFENDANT

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3 By \_\_\_\_\_  
EUGEN D. WILLIAMS, M.D.

4 DATED: January 28, 2015

DEFENDANT

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6 By   
LINDA LUI LUONG, P.A.

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8 LILU

9 DATED: January \_\_, 2015

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12 and authorized agent of FULLERTON  
13 ORTHOPAEDIC SURGERY  
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1 DATED: January \_\_, 2015

DEFENDANT

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3 By \_\_\_\_\_  
4 EUGEN D. WILLIAMS, M.D.


5 DATED: January \_\_, 2015

DEFENDANT

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7 By \_\_\_\_\_  
8 LINDA LUI LUONG, P.A.

9 DATED: January 28, 2015

DEFENDANT

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11 MICHAEL RUBENSTEIN, M.D., President  
12 and authorized agent of FULLERTON  
13 ORTHOPAEDIC SURGERY  
14 MEDICAL GROUP, INC.

15 DATED: January \_\_, 2015

JANET, JENER & SUGGS, LLC

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24 E. JEFFRIES, JR., AND REED JEFFRIES

25 DATED: January \_\_, 2015

SKIKOS, CRAWFORD, SKIKOS & JOSEPH

26 By \_\_\_\_\_  
27 GREGORY T. SKIKOS, ESQ.  
28 Attorneys for Plaintiffs,  
CLAY C. JEFFRIES, individually and as  
successor in interest for John Edward Jeffries,  
CYNTHIA A. CARDEY, PATRICK J.  
JEFFRIES, WYNEMA K. HYNDMAN, JOHN  
E. JEFFRIES, JR., AND REED JEFFRIES

1  
2 DATED: January \_\_, 2015  
3

**LA FOLLETTE, JOHNSON, DE HAAS,  
FESLER & AMES**

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5 By \_\_\_\_\_  
6 DENNIS K. AMES, ESQ.  
7 ROBERT J. IACOPINO, ESQ.  
8 Attorneys for Defendants,  
9 EUGEN D. WILLIAMS, M.D., LINDA LUI  
10 LUONG, P.A., and FULLERTON  
11 ORTHOPAEDIC SURGERY MEDICAL  
12 GROUP, INC.

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14 DATED: January \_\_, 2015  
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**DEFENDANT**

16 By \_\_\_\_\_  
17 EUGEN D. WILLIAMS, M.D.

18 DATED: January \_\_, 2015  
19

**DEFENDANT**

20 By \_\_\_\_\_  
21 LINDA LUI LUONG, P.A.


22  
23 DATED: January \_\_, 2015  
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**DEFENDANT**

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27 and authorized agent of FULLERTON  
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MEDICAL GROUP, INC.

29 DATED: January 29, 2015  
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**JANET, JENER & SUGGS, LLC**

31 By  \_\_\_\_\_  
32 ROBERT K. JENNER, ESQ.  
33 KIMBERLY DOUGHERTY, ESQ.  
34 Attorneys for Plaintiffs,  
35 CLAY C. JEFFRIES, individually and as  
36 successor in interest for John Edward Jeffries,

CYNTHIA A. CARDEY, PATRICK J.  
JEFFRIES, WYNEMA K. HYNDMAN, JOHN  
E. JEFFRIES, JR., AND REED JEFFRIES

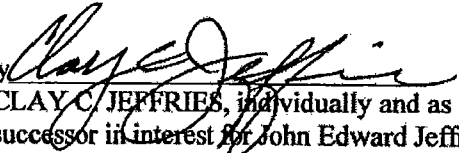
DATED: January 21, 2015

SKIKOS, CRAWFORD, SKIKOS & JOSEPH

By Gregory T. Skikos   
GREGORY T. SKIKOS, ESQ.  
Attorneys for Plaintiffs,  
CLAY C. JEFFRIES, individually and as  
successor in interest for John Edward Jeffries,  
CYNTHIA A. CARDEY, PATRICK J.  
JEFFRIES, WYNEMA K. HYNDMAN, JOHN  
E. JEFFRIES, JR., AND REED JEFFRIES

DATED: January 27, 2015

PLAINTIFF

By Clay C. Jeffries   
CLAY C. JEFFRIES, individually and as  
successor in interest for John Edward Jeffries

DATED: January 27, 2015

PLAINTIFF

By Patrick J. Jeffries   
PATRICK J. JEFFRIES

DATED: January 26, 2015

PLAINTIFF

By John E. Jeffries Jr.   
JOHN E. JEFFRIES, JR.

DATED: January 26, 2015

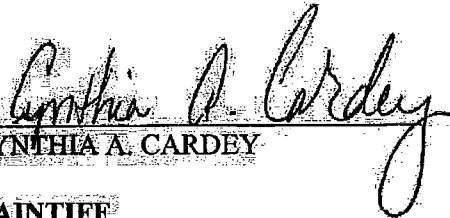
PLAINTIFF

By Reed C. Jeffries   
REED JEFFRIES

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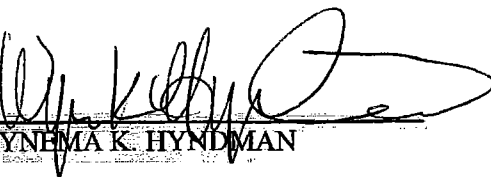
DATED: January 27, 2015

PLAINTIFF

By   
CYNTHIA A. CARDEY

DATED: January 27, 2015

PLAINTIFF

By   
WYNEMA K. HYNDMAN



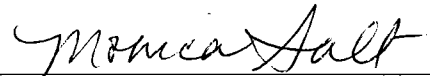
**CERTIFICATE OF SERVICE**

I, the undersigned, am employed in the County of Orange, State of California. I am over the age of eighteen years and not a party to the within action. I am employed with the law offices of La Follette, Johnson, De Haas, Fesler & Ames, 2677 N. Main Street, Suite 901, Santa Ana, California 92705.

On the below date, I electronically served a true and correct copy of the document entitled **STIPULATION TO STAY THE ACTION BETWEEN THE ARBITRATING PARTIES PENDING BINDING ARBITRATION; [PROPOSED] ORDER** on all parties in MDL No. 2419 via CM/ECF.

I declare that I am employed in the office of an attorney admitted to practice before this Court, at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on January 29, 2015, at Santa Ana, California.

  
MONICA SALT